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Enterprises, Inc., DC Comics,  
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NORTHERN DISTRICT OF CALIFORNIA  
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

**CV 12-05030**

Disney Enterprises, Inc., DC Comics and Sanrio,  
Inc.,

Plaintiffs,

v.

Vuong Tran a/k/a Vuong Nguyen a/k/a Ricky  
Tran a/k/a Ricky Vuong, an individual and d/b/a  
www.norcaljumper.com; Joey Nguyen a/k/a  
Dung Nguyen a/k/a Duong Nguyen and Does 1 –  
10, inclusive,

Defendants.

Case No.

COMPLAINT FOR COPYRIGHT  
INFRINGEMENT; TRADEMARK  
INFRINGEMENT; UNFAIR  
COMPETITION; TRADEMARK  
DILUTION; DECLARATORY RELIEF

DEMAND FOR A JURY TRIAL

Plaintiffs Disney Enterprises, Inc. ("DEI"), DC Comics ("DC Comics") and Sanrio, Inc.  
("Sanrio") (collectively "Plaintiffs") for their Complaint allege as follows:

**ALLEGATIONS COMMON TO ALL CLAIMS FOR RELIEF**

**A. Introduction**

1. Plaintiffs filed this action to combat the willful sale or rental of unlicensed and  
counterfeit products bearing the Plaintiffs' exclusive copyrights and trademarks. Defendants are  
the owners, operators, and managers of a retail business or related enterprise that is actively selling,  
offering for sale, renting, distributing, or manufacturing unlicensed and counterfeit jumper panels

and/or jumpers and related merchandise, which incorporate unauthorized likenesses of the animated or live action characters or other logos owned by Plaintiffs, including, but not necessarily limited to, Mickey Mouse, Minnie Mouse, Donald Duck, Daisy Duck, Pluto, Chip 'N' Dale, Tinker Bell, various characters from the motion pictures *Toy Story 3*, *Pirates of the Caribbean*, *High School Musical*, *The Little Mermaid* and *Hannah Montana*, Batman, Superman, Wonder Woman, Hello Kitty, KeroKeroKeroppi, My Melody and Bad Badtz-Maru (collectively "Infringing Product").

2. Plaintiffs seek a permanent injunction, damages, costs, and attorneys' fees as authorized by the Copyright Act, Lanham Act and California's common law.

#### **B. Jurisdiction and Venue**

3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1338(a) as the Plaintiffs' cause of action arises under The Copyright Act, 17 U.S.C. § 101 and the Federal Trademark Act ("The Lanham Act of 1946"), 15 U.S.C. § 1051 et seq. Further, this Court has jurisdiction over Plaintiffs' California state statutory and common law claims pursuant to 28 U.S.C. § 1367.

4. Venue is proper within the Northern District of California pursuant to 28 U.S.C. §§ 1391(b) and 1400(a).

#### **C. Plaintiffs**

5. Plaintiff Disney Enterprises, Inc. ("DEI") is a corporation, duly organized and existing under the laws of the State of Delaware, having its principal place of business in Burbank, California.

a. DEI is a subsidiary of The Walt Disney Company (the "Company"). The Company, together with its subsidiaries, is a diversified worldwide entertainment company with operations in five business segments: Media Networks, Parks and Resorts, Studio Entertainment, Consumer Products and Interactive Media. The Media Networks segment is comprised of international and domestic cable networks and its broadcasting business. The Parks and Resorts segment owns and/or operates resorts and theme parks around the world including but not limited to the Walt Disney World Resort, the Disneyland Resort and the Disney Cruise Line. The

1 Company also licenses the operations of the Tokyo Disney Resort in Japan. The Imagineering unit  
2 designs and develops new theme park concepts and attractions as well as resort properties. The  
3 Studio Entertainment segment produces and acquires live-action and animated motion pictures,  
4 direct-to-video content, musical recordings and live stage plays. The Consumer Products segment  
5 engages with licensees, manufacturers, publishers and retailers throughout the world to design,  
6 develop, publish, promote and sell a wide variety of products based on existing and new characters  
7 and other Company intellectual property through its Merchandise Licensing, Publishing and Retail  
8 businesses. The Interactive Media Group creates and delivers branded entertainment and lifestyle  
9 content across interactive media platforms, primarily the production of multi-platform games for  
10 global distribution, and Online, which produces internet websites in the United States and  
11 internationally.

12           b. A significant aspect of DEI's business is the merchandising and licensing of  
13 distinctive elements associated with its motion pictures and television programs, including, but not  
14 limited to, the world-famous fanciful characters Mickey Mouse, Minnie Mouse, Donald Duck,  
15 Daisy Duck, Pluto, Chip 'N' Dale, Tinker Bell, various characters from the motion pictures *Toy*  
16 *Story 3*, *Pirates of the Caribbean*, *High School Musical*, *The Little Mermaid* and *Hannah Montana*,  
17 among others (hereinafter individually and collectively referred to as the "DEI Characters").

18           c. The revenue from products featuring the DEI Characters sold in the United  
19 States is substantial. The appearance and other features of the DEI Characters are inherently  
20 distinctive and serve to identify DEI and its licensees as the source of products bearing the DEI  
21 Characters. The design, configuration and distinctive features of the DEI Characters, and other  
22 DEI copyrighted works, and of works related thereto (hereinafter individually and collectively  
23 referred to as "DEI's Copyrighted Designs"), are wholly original with DEI and, as fixed in various  
24 tangible media, including merchandise, are copyrightable subject matter under the United States  
25 Copyright Act, 17 U.S.C. §§ 101, *et seq.* DEI is the owner of DEI's Copyrighted Designs and, as  
26 featured on in connection with various merchandise, constitute copyrightable subject matter under  
27 the Copyright Act of 1976, 17 U.S.C. §§ 101, *et seq.*

1           d.       DEI, and its predecessors-in-interest, including Walter E. Disney, has  
2       complied in all respects with the laws governing copyright and has secured the exclusive rights and  
3       privileges in and to the copyrights to DEI's Copyrighted Designs, and DEI owns one or more  
4       certificates of registration for works in which each of DEI's Copyrighted Designs appear. A  
5       representative list of copyright registrations for DEI's Copyrighted Designs is attached hereto as  
6       Exhibit "A."

7           e.       Products featuring DEI's Copyrighted Designs, which are manufactured,  
8       sold and distributed by DEI or under its authority, have been manufactured, sold and distributed in  
9       conformity with the provisions of the copyright laws. DEI and those acting under its authority  
10      have complied with their obligations under the copyright laws, and Disney, in its own right or as  
11      successor-in-interest, has at all times been and still is the sole proprietor or otherwise authorized to  
12      enforce all right, title and interest in and to the copyrights in each of DEI's Copyrighted Designs.

13          f.       DEI is the owner of world famous registered marks, which serve to  
14      distinguish DEI products (hereinafter individually and collectively referred to as the "DEI  
15      Trademarks"). Some of those trademarks have been used continuously for over seventy years.  
16      Each year DEI spends millions of dollars to develop and maintain the considerable goodwill it  
17      enjoys in its trademarks and in its reputation for high quality. A representative list of trademark  
18      registrations for the DEI Trademarks is attached hereto as Exhibit "B."

19          g.       The DEI Trademarks are all valid, extant and in full force and effect. The  
20      DEI Trademarks are all exclusively owned by DEI. DEI has continuously used each of the DEI  
21      Trademarks from the registration date, or earlier, until the present time and at all times relevant to  
22      the claims alleged in this Complaint.

23          h.       As a result of advertising and sales, together with longstanding consumer  
24      acceptance, the DEI Trademarks serve to identify DEI's products and authorized sales of these  
25      products. The DEI Trademarks have each acquired secondary meaning in the minds of consumers  
26      throughout the United States and the world.

27          6.       DC Comics is a New York General Partnership consisting of E.C. Publications, Inc.  
28      and Warner Communications Inc., having its principal place of business in New York, New York.

1           a.       DC is engaged in the business of publishing comic magazines and is among  
2 the most well-known and successful publishers of comic magazines in the world. It has created  
3 and published highly successful and well-known characters including but not limited to BATMAN,  
4 THE JOKER, SUPERMAN, WONDER WOMAN and THE FLASH (hereinafter individually and  
5 collectively referred to as the “DC Characters”).

6           b.       A significant aspect of DC Comics’ business is the merchandising and  
7 licensing of distinctive trademarks and copyrights associated with its highly successful and well-  
8 known DC Characters. Of these, two of the most successful characters have been Batman and  
9 Superman.

10          c.       Batman first appeared in the May 1939 issue of “Detective Comics.”  
11 Numerous related characters, including “Robin,” “The Riddler,” “Two Face,” “Catwoman,” “The  
12 Penguin” and “The Joker” as well as other popular characters associated with Batman were soon  
13 introduced to the public. (Batman and the related characters are hereinafter collectively referred to  
14 as the “Batman Characters”).

15          d.       Superman appeared at least as early as 1938. Numerous related characters,  
16 including “Clark Kent,” “Lois Lane,” and “Lex Luthor” as well as other popular characters  
17 associated with Superman were soon introduced to the public. (Superman and the related  
18 characters are hereinafter collectively referred to as the “Superman Characters”).

19          e.       Since their introductions, the Batman Characters and Superman Characters  
20 have been featured in many formats, other than comic books, including movie serials, newspaper  
21 comic strips, radio shows, animated television series, live action television series, animated motion  
22 pictures, live action motion picture and theatrical presentations, among others. Television series  
23 featuring the Batman Characters and the Superman Characters have since been in continuous  
24 television syndication in the United States and abroad for many decades. These appearances have  
25 expanded the popularity of the Batman Characters and the Superman Characters beyond the comic  
26 book medium and market.

27          f.       The Batman Characters have also been featured in the 1989 motion picture  
28 entitled *BATMAN* (the “1989 Film”), the 1992 motion picture entitled *BATMAN RETURNS* (the

“1992 Film”), the 1995 motion picture entitled *BATMAN FOREVER* (the “1995 Film”), the 1997 motion picture entitled *BATMAN & ROBIN* (the “1997 Film”), the 2005 motion picture entitled *BATMAN BEGINS* (the “2005 Film”), the 2008 motion picture entitled *THE DARK KNIGHT* (the “2008 Film”) and the most recent motion picture entitled *THE DARK KNIGHT RISES* (“2012 Film”).

g. The 1989 Film generated over \$251 million dollars in domestic box office receipts. The 1992 Film generated over \$162 million dollars in domestic box office receipts. The 1995 Film generated over \$184 million dollars in domestic box office receipts. The 1997 Film generated over \$107 million dollars in domestic box office receipts. The 2005 Film generated over \$205 million dollars in domestic box office receipts. The 2008 Film generated over \$533 million dollars in domestic box office receipts. And the 2012 Film has generated over \$420 million dollars in domestic box office receipts to date. The *BATMAN* motion pictures have resulted in domestic gross box office receipts in over a billion dollars, not to mention additional revenues from syndication rights and home video distribution. The *BATMAN* motion pictures have proven to be among the most successful licensing and merchandising ventures of all time, with gross retail sales of associated licensed merchandise exceeding \$1,000,000,000.

h. The Superman Characters have also appeared in numerous theatrical motion pictures since their introduction. The most recent motion picture featuring the Superman Characters, *SUPERMAN RETURNS*, was released on June 28, 2006, and has generated more than \$200 million dollars in domestic box office receipts and more than \$190 million dollars in international box office receipts. The Superman Characters have also been featured in numerous other theatrical motion pictures, including a series of four motion pictures starring Christopher Reeve. Such motion pictures include *SUPERMAN THE MOVIE*, *SUPERMAN II*, *SUPERMAN III* and *SUPERMAN IV: THE QUEST FOR PEACE*, all of which collectively generated over \$750 million dollars in worldwide box office receipts.

i. Revenues generated from products and services using the DC Characters sold in the United States are substantial. The appearance and other features of the DC Characters are inherently distinctive and serve to identify DC Comics and its licensees as the source of

1 products bearing the DC Characters. The design, configuration and distinctive features of the DC  
2 Characters and other DC Comics' copyrighted works, and of works related thereto (hereinafter  
3 individually and collectively referred to as the "DC Comics' Copyrighted Designs"), are wholly  
4 original with DC Comics and, as fixed in various tangible media, including, without limitation,  
5 merchandise, are copyrightable subject matter under the United States Copyright Act, 17 U.S.C.,  
6 §§ 101, et seq. DC Comics is the owner of DC Comics' Copyrighted Designs and, as featured on  
7 in connection with various merchandise, these designs constitute copyrightable subject matter  
8 under the Copyright Act of 1976, 17 U.S.C. §§ 101, et seq.

9 j. DC Comics has complied in all respects with the laws governing copyright  
10 and has secured the exclusive rights and privileges in and to the copyrights to the DC Comics'  
11 Copyrighted Designs, and DC Comics owns one or more certificates of registration for works in  
12 which each of the DC Comics' Copyrighted Designs appear. A representative list of copyright  
13 registrations for the DC Comics' Copyrighted Designs is attached as Exhibit "C."

14 k. Products featuring the DC Comics' Copyrighted Designs manufactured, sold  
15 and distributed by DC Comics or under its authority have been manufactured, sold and distributed  
16 in conformity with the provisions of the copyright laws. DC Comics and those acting under its  
17 authority have complied with their obligations under the copyright laws and DC Comics has at all  
18 times been and still is the sole proprietor or otherwise authorized to enforce all right, title and  
19 interest in and to the copyrights in each of the DC Comics' Copyrighted Designs.

20 l. DC Comics owns all right, title and interest in and to and holds exclusive  
21 right to develop, manufacture, market and sell product bearing the trademarks, trade names, service  
22 marks, artwork, characters and other distinctive elements for and incorporating the DC Characters.

23 m. DC Comics is the owner of world famous registered marks which serve to  
24 distinguish DC products (hereinafter individually and collectively referred to as the "DC Comics  
25 Trademarks"). Each year DC Comics spends millions of dollars to develop and maintain the  
26 considerable good will it enjoys in its trademarks and in its reputation for high quality. A  
27 representative list of trademark registrations for the DC Comics Trademarks is attached as Exhibit  
28

“D,” including, but not limited to, the trademark registration of the Superman “S in Shield Logo” and the Batman “Bat Emblem” devices are depicted below:



n. The DC Comics Trademarks are all valid, extant and in full force and effect. The DC Comics Trademarks are all exclusively owned by DC Comics. DC Comics has continuously used each of the DC Comics Trademarks from the registration date, or earlier, until the present and at all times relevant to the claims alleged in this Complaint.

o. DC has granted and transferred to its related companies, Warner Bros. Consumer Products Inc., and WB Studio Enterprises Inc., subsidiaries of Warner Bros. Entertainment Inc., the right to supervise in the United States the merchandising and licensing of the copyrighted elements, trademarks, trade names and service marks incorporated in or associated with the DC Characters. Currently, Plaintiffs have numerous active license agreements in the United States. These agreements provide for the authorized use of the DC Characters on products and in connection with services, including jumper panels and/or jumpers, among others.

p. As a result of advertising and sales, together with longstanding consumer acceptance, the DC Comics Trademarks identify DC Comics' products and authorized sales of these products. The DC Comics Trademarks have each acquired secondary meaning in the minds of consumers throughout the United States and the world. DC Comics' Copyrighted Designs and the DC Comics Trademarks are collectively referred to herein as "DC Comics' Properties."

7. Plaintiff Sanrio, Inc. ("Sanrio") is a corporation, duly organized and existing under the laws of the State of California, having its principal place of business in South San Francisco, California. Sanrio is a wholly owned subsidiary of Sanrio Company, Ltd. Sanrio Company, Ltd. is a corporation organized under the laws of Japan, having its principal place of business in Tokyo, Japan (hereinafter referred to as "Sanrio Company").

1           a.       For more than fifty years, Sanrio Company has been engaged in the business  
2 of manufacturing, distributing and selling a wide range of products including, without limitation,  
3 character artwork created, developed and designed by Sanrio Company for use by children and  
4 young adults. Certain of the characters and designs have achieved such global fame and popularity  
5 that Sanrio Company has produced and distributed television programming for children based on  
6 the character artwork. One such television program is the animated television series entitled *Hello*  
7 *Kitty*.

8           b.       A significant source of revenue for Sanrio Company is the merchandising  
9 and licensing of distinctive elements bearing character artwork, including, but not limited to, Hello  
10 Kitty, Charmmy Kitty, Ahiru No Pekkle, Osaru No Monkichi, Bad Badtz-Maru, KeroKeroKeroppi,  
11 My Melody (hereinafter individually and collectively referred to as the “Sanrio Company  
12 Characters”).

13           c.       The revenue from products using the Sanrio Company Characters sold in the  
14 United States is substantial. The appearance and other features of the Sanrio Company Characters  
15 are inherently distinctive and serve to identify Sanrio Company as the source of products bearing  
16 the Sanrio Company Characters. The design, configuration and distinctive features of the Sanrio  
17 Company Characters and other Sanrio Company copyrighted works, and of works related thereto  
18 (hereinafter individually and collectively referred to as “Sanrio Company’s Copyrighted Designs”)  
19 are wholly original with Sanrio Company and, as fixed in various tangible media including,  
20 without limitation, merchandise, are copyrightable subject matter under the United States  
21 Copyright Act, 17 U.S.C., § 101, *et seq.* Sanrio Company is the owner of Sanrio Company’s  
22 Copyrighted Designs and, as featured on and in connection with various merchandise, these  
23 designs constitute copyrightable subject matter under the Copyright Act of 1976, 17 U.S.C. § 101,  
24 *et seq.*

25           d.       Sanrio Company has complied in all respects with the laws governing  
26 copyright and has secured the exclusive rights and privileges in and to the copyrights to Sanrio  
27 Company’s Copyrighted Designs, and Sanrio Company owns one or more certificates of  
28 registration for works in which each of Sanrio Company’s Copyrighted Designs appear. A

1 representative list of copyright registrations for Sanrio Company's Copyrighted Designs is attached  
2 hereto as Exhibit "E." Sanrio Company's Copyrighted Designs manufactured, sold, and distributed  
3 by Sanrio Company or under its authority have been manufactured, sold, and distributed in  
4 conformity with the provisions of the copyright laws. Sanrio Company and those acting under its  
5 authority have complied with their obligations under the copyright laws. Sanrio, as the exclusive  
6 United States licensee for Sanrio Company, is authorized to enforce all right, title, and interest in  
7 and to the copyrights in each of Sanrio Company's Copyrighted Designs.

8 e. Sanrio Company owns all right, title, and interest in and to and holds  
9 exclusive rights to develop, manufacture, market, and sell products bearing the trademarks, trade  
10 names, service marks, artwork, characters, and other distinctive elements for and incorporating the  
11 Sanrio Company Characters.

12 f. Sanrio Company is the owner of world famous registered marks, which  
13 serve to distinguish Sanrio Company products (hereinafter individually and collectively referred to  
14 as the "Sanrio Company Trademarks"). Some of those trademarks have been used continuously  
15 for more than twenty-five years. Each year Sanrio Company spends millions of dollars to develop  
16 and maintain the considerable good will it enjoys in its trademarks and in its reputation for high  
17 quality. A representative list of trademark registrations for the Sanrio Company Trademarks is  
18 attached hereto as Exhibit "F."

19 g. The Sanrio Company Trademarks are all valid, extant, and in full force and  
20 effect. Sanrio Company's Trademarks are exclusively owned by Sanrio Company. Sanrio  
21 Company has continuously used each of the Sanrio Company Trademarks from the registration  
22 date, or earlier, until the present and at all times relevant to the claims alleged in this Complaint.

23 h. As a result of advertising and sales, together with longstanding consumer  
24 acceptance, the Sanrio Company Trademarks identify Sanrio Company's products and authorized  
25 sales of these products. The Sanrio Company Trademarks have each acquired secondary meaning  
26 in the minds of consumers throughout the United States and the world. Sanrio, as the exclusive  
27 U.S. licensee for Sanrio Company, is authorized to enforce all right, title, and interest in and to the  
28 copyrights in each of the Sanrio Company Trademarks.

i. Through Sanrio, Sanrio Company has authorized and licensed the manufacture and sale of various different types of product, which bear the Sanrio Copyrighted Designs and Trademarks, including, but not limited to, jumper panels and/or jumpers, and other products.

9. The DEI Characters, DC Characters and Sanrio Company Characters are collectively referred to herein as "Plaintiffs' Characters." Disney's Copyrighted Designs, DC Comics' Copyrighted Designs and the Sanrio Company Copyrighted Designs are collectively referred to herein as "Plaintiffs' Copyrighted Designs." The DEI Trademarks, DC Comics Trademarks and Sanrio Company Trademarks are collectively referred to herein as "Plaintiffs' Trademarks." Plaintiffs' Copyrighted Designs and Plaintiffs' Trademarks are collectively referred to herein as "Plaintiffs' Properties."

#### **D. Defendants**

10. Defendant Vuong Tran also known as Vuong Nguyen also known as Ricky Tran also known as Ricky Vuong ("Vuong") is an individual and doing business as www.norcaljumper.com, Amazon.com seller "vttranz11" and eBay seller using the identities "jumpon88", "vttranz12" and "julienguyen99", and is a resident of the city of San Jose, County of Santa Clara and State of California. Plaintiffs are informed and believe, and upon that basis allege, that Vuong does business through the website, including but not limited to, www.norcaljumper.com, via Amazon.com using the seller identity "vttranz11" and via eBay using the seller identities "jumpon88", "vttranz12" and "julienguyen99". Plaintiffs are further informed and believe, and based thereon allege, that Vuong had the right and ability to supervise or control the infringing activity alleged herein and that Vuong had a direct financial interest in such activity. In addition or alternatively, Vuong had knowledge or reason to know of the infringing activity and took actions which contributed to such activity.

11. Defendant Joey Nguyen also known as Dung Nguyen also known as Duong Nguyen ("Nguyen") is an individual and doing business as www.norcaljumper.com, Amazon.com seller "vttranz11" and eBay seller using the identities "jumpon88", "vttranz12" and "julienguyen99", and is a resident of the city of San Jose, County of Santa Clara and State of California. Plaintiffs

1 are informed and believe, and upon that basis allege, that Nguyen does business through the  
2 website, including but not limited to, www.norcaljumper.com, via Amazon.com using the seller  
3 identity "vttranz11" and via eBay using the seller identities "jumpon88", "vttranz12" and  
4 "julienguyen99". Plaintiffs are further informed and believe, and based thereon allege, that  
5 Nguyen had the right and ability to supervise or control the infringing activity alleged herein and  
6 that Nguyen had a direct financial interest in such activity. In addition or alternatively, Nguyen  
7 had knowledge or reason to know of the infringing activity and took actions which contributed to  
8 such activity.

9 12. Upon information and belief, Does 1 – 10 are either entities or individuals who are  
10 residents of or present in this judicial district, and are subject to the jurisdiction of this Court.  
11 Upon information and belief, Does 1 – 10 are principals or supervisory employees of the named  
12 defendants, suppliers of the named defendants or other entities or individuals who are  
13 manufacturing, distributing, selling and/or offering for rent and/or sale jumper panels and/or  
14 jumpers and related merchandise in this judicial district which infringes some or all of Plaintiffs'  
15 intellectual properties. The identities of the various Does are unknown to Plaintiffs at this time.  
16 The Complaint will be amended to include the names of such individuals when identified. The  
17 named defendants and Does 1 – 10 are collectively referred to herein as "Defendants."

18 **COUNT I - COPYRIGHT INFRINGEMENT**

19 13. Plaintiffs bring the following claim of copyright infringement against the  
20 Defendants and incorporate by reference allegations 1 through 13 above.

21 14. Defendants have manufactured, distributed, sold, offered for sale, or rented  
22 unauthorized or counterfeit jumper panels and/or jumpers and related merchandise bearing the  
23 copyrighted properties of the Plaintiffs. Itemized lists of some, but not all, of said copyrighted  
24 properties infringed upon appear in Exhibits "A," "C" and "E".

25 15. Defendants have never been authorized by the Plaintiffs to distribute the Plaintiffs'  
26 copyrighted properties, nor have the Plaintiffs ever authorized, licensed, or in any manner allowed  
27 the Defendants the right to manufacture, distribute, sell, offer for sale, or rent any merchandise  
28

1 including, but not limited to, jumper panels and/or jumpers or related merchandise which bear any  
2 of said copyrighted properties.

3 16. Defendants have manufactured, distributed, sold, offered for sale, or rented  
4 unauthorized or counterfeit jumper panels and/or jumpers and other merchandise which incorporate  
5 the Plaintiffs' copyrighted properties, in direct violation of the Plaintiffs' copyrights.

6 17. Defendants have manufactured, distributed, sold, offered for sale, or rented  
7 counterfeit or unauthorized jumper panels and/or jumpers or other merchandise bearing the  
8 Plaintiffs' copyrighted properties. Defendants committed their acts with actual as well as  
9 constructive knowledge of the Plaintiffs' exclusive rights, and their actions have contributed to the  
10 infringing, copying, duplication, sale, offer for sale, or rental of counterfeit copies of the Plaintiffs'  
11 copyrighted properties. Each act by the Defendants that infringes one of the Plaintiffs' copyrights  
12 is the basis for a separate claim against the Defendants under the Copyright Act.

13 18. Upon information and belief, Defendants' acts as alleged are willful infringements  
14 of and have irreparably harmed the Plaintiffs' copyrights and exclusive rights and threaten further  
15 infringements and further irreparable harm to Plaintiffs' copyrights and exclusive rights. Further  
16 harm and injury to Plaintiffs is imminent, and the Plaintiffs are without an adequate remedy at law  
17 with respect to such harm and injury. Unless Defendants' acts are enjoined and the illicit  
18 counterfeiters of the Plaintiffs' copyrighted properties are stopped, it is highly probable that the  
19 Defendants, or others under Defendants' direction, will manufacture, distribute, sell, offer for sale,  
20 or rent additional counterfeit jumper panels and/or jumpers or other merchandise which bear the  
21 Plaintiffs' copyrighted properties causing further irreparable injury to Plaintiffs.

22 19. Defendants have obtained gains, profit, and advantages as a result of their wrongful  
23 acts noted above.

24 20. The Plaintiffs are entitled, at their option, to statutory damages as provided by  
25 17.U.S.C. § 504 in lieu of actual damages and the Defendants' profits.

26 **COUNT II - TRADEMARK INFRINGEMENT AND TRADEMARK COUNTERFEITING**

27 21. Plaintiffs bring the following claim of trademark infringement against the  
28 Defendants and incorporate by reference paragraphs 1 through 21 above.

1           22.     Plaintiffs own or are licensees of the exclusive rights to those trademarks indexed  
2 on Exhibits "B," "D" and "F". All of the trademark registrations are in full force and effect and are  
3 owned by the Plaintiffs or Plaintiffs' licensors. Many of the trademarks are incontestable pursuant  
4 to 15 U.S.C. § 1065.

5           23.     Plaintiffs, or those under their authority, manufacture and distribute all of their  
6 advertising and products in conformity with the provisions of the United States trademark law.

7           24.     Notwithstanding the Plaintiffs' or their licensors' well-known and prior common  
8 law and statutory rights in the trademarks, Defendants have, with actual and constructive notice of  
9 the Plaintiffs' federal registration rights and long after the Plaintiffs' established their rights,  
10 adopted and used the trademarks in conjunction with the sale of unauthorized jumper panels and/or  
11 jumpers and related merchandise in the State of California and interstate commerce.

12           25.     Defendants have distributed, sold, offered for sale, or rented jumper panels and/or  
13 jumpers and related merchandise bearing Plaintiffs' trademarks without Plaintiffs' authorization.  
14 Defendants' distribution, sale, offer for sale, or rental of unauthorized jumper panels and/or  
15 jumpers and related merchandise bearing Plaintiffs' trademarks in California and interstate  
16 commerce has and will cause the likelihood of confusion, deception, and mistake in that the buying  
17 public will conclude that the products sold by the Defendants are authorized, sponsored, approved,  
18 or associated with the Plaintiffs.

19           26.     Said acts of infringement will cause irreparable injury to the Plaintiffs if the  
20 Defendants are not restrained by the Court from further violation of the Plaintiffs' rights as the  
21 Plaintiffs have no adequate remedy at law.

22           27.     The Plaintiffs have suffered damages as a result of the Defendants' acts.

23           28.     Defendants' use in commerce of Plaintiffs' trademarks in conjunction with the sale  
24 of jumper panels and/or jumpers and related merchandise is an infringement of Plaintiffs'  
25 registered trademarks in violation of 15 U.S.C. § 1114(1).

26           29.     Defendants committed the acts alleged herein intentionally, fraudulently,  
27 maliciously, willfully, wantonly, and oppressively with the intent to injure the Plaintiffs and their  
28 businesses.

1           30.     The unlicensed jumper panels and/or jumpers bearing the Plaintiffs' trademarks that  
2     the Defendants' sold, distributed, offered for sale, or rented constitutes a counterfeit product  
3     pursuant to 15 U.S.C. § 1116(d).

4                     **COUNT III - UNFAIR COMPETITION UNDER THE LANHAM ACT**

5           31.     Plaintiffs bring the following claim of unfair competition against Defendants and  
6     incorporate by reference the allegations set forth in paragraphs 1 through 31 above.

7           32.     As a direct result of the Plaintiffs' longstanding use, sales, advertising, and  
8     marketing, Plaintiffs' trademarks have acquired a secondary and distinctive meaning among the  
9     public who have come to identify Plaintiffs' trademarks listed on Exhibits "B," "D," "F," and "H"  
10    with the Plaintiffs and their respective products.

11          33.     The unauthorized and counterfeit jumper panels and/or jumpers and related  
12    merchandise that the Defendants have sold and/or rented and/or distributed exactly duplicates and  
13    appropriated Plaintiffs' trademarks and deludes and confuses the public into believing that the  
14    Plaintiffs approved, authorized, or sponsored the jumper panels and/or jumpers and related  
15    merchandise sold, offered for sale, or distributed by the Defendants.

16          34.     Defendants, by misappropriating and using the likenesses of Plaintiffs' trademarks  
17    in connection with the sale of jumper panels and/or jumpers and related merchandise, is  
18    misrepresenting and will continue to misrepresent and falsely describe to the general public the  
19    origin and sponsorship of their products. Defendants have caused such products to enter into  
20    interstate commerce willfully with full knowledge of the falsity of the designation of their origin  
21    and description and representation in an effort to mislead the purchasing public into believing that  
22    their products are authorized or emanate from the Plaintiffs.

23          35.     These acts constitute a violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

24          36.     The Defendants have obtained gains, profits, and advantages as a result of their  
25    unlawful acts.

26          37.     The Plaintiffs have suffered monetary damages as a result of the Defendants' acts.

**COUNT IV - UNFAIR COMPETITION UNDER CALIFORNIA'S COMMON LAW**

38. Plaintiffs bring the following claim of unfair competition against Defendants and incorporate by reference the allegations set forth in paragraphs 1 through 38 above.

39. Plaintiffs have expended significant sums of money in advertising and marketing products featuring its products and in creating a consumer demand for such products in California and elsewhere in the United States. Consequently, these products have become widely known and accepted.

40. Defendants have distributed and sold unauthorized and counterfeit jumper panels and/or jumpers and related merchandise bearing exact copies of Plaintiffs' trademarks in California, thereby passing them off as products authorized or distributed by the Plaintiffs.

41. Defendants have knowingly and willfully appropriated Plaintiffs' trademarks in an effort to create the impression that the Defendants' counterfeit products are sanctioned by the Plaintiffs and to misappropriate all of the goodwill associated with Plaintiffs' trademarks.

42. The Defendants' acts constitute unfair competition and will, unless enjoined by this Court, result in the destruction or dilution of the goodwill in Plaintiffs' trademarks and of Plaintiffs' valuable trademark rights to the unjust enrichment of the Defendants.

43. The unauthorized products that are sold by the Defendants are calculated and likely to deceive and mislead the purchasers who buy them in the belief that they originate with or are authorized by the Plaintiffs.

44. The continued passing off by the Defendants of such unauthorized products as if such products originated from the Plaintiffs has caused and, unless restrained, will continue to cause serious and irreparable injury to the Plaintiffs.

45. The Plaintiffs have no adequate remedy at law and suffers irreparable harm as a result of the Defendants' acts.

46. The Plaintiffs have suffered damages as a result of the Defendants' acts.

47. Defendants committed the alleged acts intentionally, fraudulently, maliciously, willfully, wantonly, and oppressively with the intent to injure the Plaintiffs' and their businesses.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs demand entry of a judgment against the defendant as follows:

1. Permanent injunctive relief restraining the Defendants, their officers, agents, servants, employees, attorneys, and all those in active concert or participation with them from:

a. Further infringing Plaintiffs' copyrighted properties, trademarks, and licensed trademarks by manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, renting, advertising, promoting, displaying, or otherwise disposing of any products not authorized by the Plaintiffs including, but not limited to, jumper panels and/or jumpers and related merchandise bearing any simulation, reproduction, counterfeit, copy, or colorable imitation of any of Plaintiffs' trademarks ("Unauthorized Products");

b. Using any simulation, reproduction, counterfeit, copy, or colorable imitation of any of Plaintiffs' copyrighted properties, trademarks, and licensed trademarks in the promotion, advertisement, display, sale, offer for sale, rental, manufacture, production, circulation, or distribution of Unauthorized Products in such fashion as to relate or connect, or tend to relate or connect, such products in any way to the Plaintiffs or to any goods sold, manufactured, sponsored, or approved by or connected with the Plaintiffs;

c. Making any statement or representation whatsoever, or using any false designation of origin or false description, or performing any act that can or is likely to lead the trade or public, or individual members thereof, to believe that any products manufactured, distributed, or sold by the Defendants is in any manner associated or connected with the Plaintiffs, or are sold, manufactured, licensed, sponsored, approved, or authorized by the Plaintiffs;

d. Engaging in any other activity constituting unfair competition with any of the Plaintiffs, or constituting an infringement of any of Plaintiffs' trademarks or of Plaintiffs' rights in, or to use or to exploit said trademarks, or constituting any dilution of any of the Plaintiffs' names, reputations, or goodwill;

e. Effecting assignments or transfers, forming new entities or associations or using any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in Subparagraphs a. through d.;

1           f.        Secreting, destroying, altering, removing, or otherwise dealing with the  
2       Unauthorized Products or any books or records that may contain any information relating to the  
3       importing, manufacturing, producing, distributing, circulating, selling, marketing, offering for sale,  
4       renting, advertising, promoting, or displaying of all unauthorized products that infringe any of the  
5       Plaintiffs' trademarks or copyrights; and

6           g.        From aiding, abetting, contributing to, or otherwise assisting anyone from  
7       infringing upon any of the Plaintiffs' trademarks or copyrights.

8           2.        Directing that the Defendants deliver for destruction all Unauthorized Products  
9       including jumper panels and/or jumpers, labels, signs, prints, packages, dyes, wrappers,  
10      receptacles, and advertisements in their possession or under their control bearing any of Plaintiffs'  
11      trademarks or any simulation, reproduction, counterfeit, copy, or colorable imitation thereof, and  
12      all plates, molds, heat transfers, screens, matrices, and other means of making the same.

13          3.        In order to give practical meaning effect to any preliminary and permanent  
14      injunctions, the domain name(s) be ordered immediately transferred by the Defendants, the  
15      Registry and the Registrars to Plaintiffs' control.

16          4.        Directing that the Defendants report to this Court within thirty (30) days after a  
17      Permanent Injunction is entered to show its compliance with paragraphs 1 and 2 above.

18          5.        Directing such other relief as the Court may deem appropriate to prevent the trade  
19      and public from gaining the erroneous impression that the Plaintiffs authorized or are related in any  
20      way to any products manufactured, sold, rented, or otherwise circulated or promoted by the  
21      Defendants.

22          6.        Awarding to the Plaintiffs from the Defendants, as a result of the Defendants' sale  
23      of Unauthorized Products bearing the Plaintiffs' trademarks, three times the Plaintiffs' damages  
24      and three times the Defendants' profits, after an accounting, or statutory damages, should the  
25      Plaintiffs opt for such relief, consisting of \$200,000.00 for each of the Plaintiffs' trademarks  
26      infringed upon by the Defendants, and to the extent this Court concludes such infringement was  
27      willful, \$2,000,000.00 for the Plaintiffs' trademarks infringed upon by the Defendants pursuant to  
28      15 U.S.C. § 1114 and § 1117.

7. Awarding to each Plaintiff from the Defendants selling Unauthorized Products three times its damages therefrom and three times Defendants' profits therefrom, after an accounting, pursuant to 15 U.S.C. § 1125(a) and § 1117.

8. That Plaintiffs be awarded from each Defendant found to be in violation of their copyrighted properties, the Defendants' profits, or at Plaintiffs' election, an award of statutory damages pursuant to 15 U.S.C. § 504, of no less than Seven Hundred Fifty Dollars (\$750) nor more than Thirty Thousand Dollars (\$30,000) per copyrighted property infringed upon by each Defendant, at the Court's discretion, or should this Court find that such infringement was willful, that this Court, pursuant to its discretion, award statutory damages of up to One Hundred Fifty Thousand Dollars (\$150,000) for each copyrighted property infringed upon by each such Defendant.

9. Awarding to the Plaintiffs its reasonable attorneys' fees and investigative fees pursuant to 15 U.S.C. § 1117.

10. Awarding to the Plaintiffs their costs in bringing this action.

11. Awarding punitive damages to the Plaintiffs for the Defendants' willful acts of unfair competition under California's common law.

12. Awarding other such relief to the Plaintiffs as this Court deems just.

Dated: September 27, 2012

J. Andrew Coombs, A Professional Corp.

By: \_\_\_\_\_

J. Andrew Coombs  
Annie S. Wang

Attorneys for Plaintiffs Disney Enterprises, Inc., DC  
Comics and Sanrio, Inc.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs Disney Enterprises, Inc., DC Comics and Sanrio, Inc. hereby demand a trial by jury of all issues so triable.

DATED: September 27, 2012

J. Andrew Coombs, A Professional Corp.

By: 

J. Andrew Coombs

Annie S. Wang

Attorneys for Plaintiffs Disney Enterprises, Inc., DC Comics and Sanrio, Inc.



**EXHIBIT A**  
**DEI'S COPYRIGHTED DESIGNS**

<b>Copyright Registration</b>	<b>Title of Work (Character)</b>	<b>Type of Work</b>
VA 58 937	Mickey - 1 (Mickey Mouse)	Model Sheet
VA 58 938	Minnie - 1 (Minnie Mouse)	Model Sheet
Gp 80 184	Donald Duck	Publications Model Sheet
VA 58 933	Daisy - 1 (Daisy Duck)	Model Sheet
VA 58 936	Goofy -1 (Goofy)	Model Sheet
Gp 80 192	Pluto	Publications Model Sheet
VAu 64 814	Baby Mickey	Model Sheet
VAu 64 814	Baby Minnie	Model Sheet
VAu 73 216	Baby Donald Duck	Model Sheet
VAu 73 217	Baby Daisy Duck	Model Sheet
VAu 83 225	Baby Goofy	Model Sheet
VAu 73 219	Baby Pluto	Model Sheet
R 48 971	Disney's Uncle Scrooge in Only a Poor Old Man	Comic Strip
RE 424 728	Walt Disney's Ludwig von Drake	Comic Strip
Gp 105 126	Horace Horsecollar	Model Sheet
R 567 615	Chip	Model Sheet
R 567 614	Dale	Model Sheet
VA 184 345	Huey, Dewey & Louie -1	Model Sheet
Gp 105 128	Clarabelle Cow	Model Sheet
RE 636 587	<b>Winnie the Pooh and the Honey Tree</b>	Motion Picture
RE 718 378	<b>Winnie the Pooh and the Blustery Day</b>	Motion Picture
VA 58 940	Pooh - 1 (Winnie the Pooh)	Model Sheet
Gp 81 528	Rabbit	Publications Model Sheet
Gp 81 528	Owl	Publications Model Sheet
Gp 85 651	Kanga and Roo	Publications Model Sheet
Gp 81 528	Eeyore	Publications Model Sheet
Gp 81 528	Piglet	Publications Model Sheet
Gp 81 528	Gopher	Publications Model Sheet
Gp 81 527	Tigger	Publications Model Sheet
R 354 235	<b>Snow White and the Seven Dwarfs</b>	Motion Picture
R 346 870	Bashful	Drawings
R 346 869	Doc	Drawings
R 346 875	Dopey	Drawings
R 346 876	Grumpy	Drawings

1	R 346 871	Happy	Drawings
2	R 346 874	Sleepy	Drawings
3	R 346 873	Sneezy	Drawings
4	R 346 872	Snow White	Drawings
5	R 346 868	Snow White "Witch"	Drawings
6	R 406 910	<b>Pinocchio</b>	Motion Picture
7	Gp 80 186	Pinocchio	Publications Model Sheet
8	Gp 80 188	Jiminy Cricket	Publications Model Sheet
9	R 427 860	<b>Fantasia</b>	Motion Picture
10	R 433 627	<b>The Reluctant Dragon</b>	Motion Picture
11	R 442 538	<b>Dumbo</b>	Motion Picture
12	R 428 428	Dumbo Suggestions for Dumbo	Drawing
13	R 428 420	Mother Elephant Suggestions for "Dumbo"	Drawing
14	R 428 430	Dumbo Ringmaster Suggestions 1348	Drawing
15	R 428 427	Dumbo - Stork Suggestions	Drawing
16	R 428 426	Timothy Mouse Suggestions	Drawing
17	R 428 432	Dumbo "Miscellaneous Crows" - 2006	Drawing
18	R 458 260	<b>Bambi</b>	Motion Picture
19	R 433 645	Bambi - Bambi	Drawing
20	R 433 630	Bambi - Final Thumper Model - 2002	Drawing
21	R 433 631	Bambi - Skunk Model - 2002	Drawing
22	R 433 636	Bambi - Owl and Stag Models	Drawing
23	R 433 632	Faline "Adolescent Age"	Drawing
24	R 433 633	Bambi's Mother	Drawing
25	R 467 541	<b>Saludos Amigos</b>	Motion Picture
26	R 464 785	Joe Carioca	Drawing
27	R 516 560	<b>The Three Caballeros</b>	Motion Picture
28	R 550 316	<b>Make Mine Music</b>	Motion Picture
	R 557 922	<b>Song of the South</b>	Motion Picture
	R 548 629	Brer Rabbit	Drawing
	R 548 626	Brer Bear	Drawing
	R 577 489	<b>Fun and Fancy Free</b>	Motion Picture
	R 605 180	<b>Melody Time</b>	Motion Picture
	R 636 303	<b>The Adventures of Ichabod &amp; Mr. Toad</b>	Motion Picture
	R 648 396	<b>Cinderella</b>	Motion Picture
	R 632 319	Cinderella	Copyright Booklet
	R 632 319	Drizella	Copyright Booklet
	R 632 319	Anastasia	Copyright Booklet
	R 632 319	Stepmother	Copyright Booklet
	R 632 319	Fairy Godmother	Copyright Booklet
	R 632 319	Prince	Copyright Booklet
	R 632 319	Bruno, the Dog	Copyright Booklet
	R 632 319	Lucifer, the Cat	Copyright Booklet
	R 632 319	Jaqu and Gus	Copyright Booklet
	RE 27 746	<b>Alice in Wonderland</b>	Motion Picture
	VA 58 920	Alice - 1 (Alice)	Model Sheet
	VA 58 919	Alice - 2 (The White Rabbit)	Model Sheet
	VA 58 921	Alice - 3 (Queen of Hearts)	Model Sheet

1	VA 58 922	Alice - 4 (Cheshire Cat)	Model Sheet
2	VA 58 923	Alice - 5 (Caterpillar)	Model Sheet
3	VA 58 924	Alice - 6 (Tweedledee and Tweedledum)	Model Sheet
4	VA 58 922	March Hare	Model Sheet
5	VA 58 922	Mad Hatter	Model Sheet
6	RE 64 027	<b>Peter Pan</b>	Motion Picture
7	RE 66 285	Peter Pan	Coloring Book
8	RE 66 285	Tinkerbell	Coloring Book
9	RE 66 285	Captain Hook	Coloring Book
10	RE 66 285	Mr. Smee	Coloring Book
11	RE 66 285	Nana	Coloring Book
12	RE 162 852	<b>Lady and the Tramp</b>	Motion Picture
13	RE 101 764	Lady	Previews of Pictures
14	RE 101 764	Tramp	Previews of Pictures
15	RE 296 296	<b>Sleeping Beauty</b>	Motion Picture
16	RE 246 671	Princess Aurora	Book
17	RE 246 671	Prince Phillip	Book
18	RE 246 671	Maleficent/Dragon	Book
19	RE 370 901	<b>One Hundred and One Dalmatians</b>	Motion Picture
20	RE 546 478	<b>The Sword in the Stone</b>	Motion Picture
21	RE 557 357	Archimedes	Copyright Booklet
22	RE 557 357	Merlin	Copyright Booklet
23	RE 557 357	Wart/Arthur	Copyright Booklet
24	RE 557 357	Madame Mim	Copyright Booklet
25	RE 571 201	<b>Mary Poppins</b>	Motion Picture
26	RE 705 510	<b>The Jungle Book</b>	Motion Picture
27	RE 679 798	Mowgli	Drawing
28	RE 679 799	Baloo	Drawing
	RE 679 795	Bagheera	Drawing
	RE 679 805	King Louie	Drawing
	RE 679 797	Kaa	Drawing
	RE 679 807	Shere Khan	Drawing
	Lp 38 283	<b>The Aristocats</b>	Motion Picture
	Gu 44 754	O'Malley	Drawing
	Gu 44 750	Duchess	Drawing
	Gu 44 748	Edgar	Drawing
	Gu 44 745	Roquefort	Drawing
	VA 1-099-033	Marie Valentine Spring 2002	Style Guide
	Lp 39 817	<b>Bedknobs and Broomsticks</b>	Motion Picture
	Gu 46 904	Crocky	Drawing
	Gu 46 908	Sailor Bear	Drawing
	Gu 46 906	Codfish	Drawing
	Gu 46 917	Secretary Bird	Drawing
	LP 42 905	<b>Robin Hood</b>	Motion Picture
	Gu 46 582	Robin Hood	Drawing
	Gu 46 583	Little John	Drawing
	Gu 46 584	Sir Hiss	Drawing
	Gu 47 230	Sheriff of Nottingham	Drawing
	Gu 47 762	Friar Tuck	Drawing

1	Gu 46 585	Prince John	Drawing
2	Gu 50 764	Maid Marion	Drawing
3	Gu 50 763	Lady Cluck	Drawing
4	Lp 49 678	<b>The Rescuers</b>	Motion Picture
5	Gp 96 289	Miss Bianca	Drawing
6	Gp 96 286	Orville	Drawing
7	Gp 96 288	Madame Medusa	Drawing
8	Gp 96 287	Bernard	Drawing
9	Gp 103 814	Penny	Drawing
10	Gu 57 278	Rufus	Drawing
11	Gu 56 625	Evinrude	Drawing
12	PA 1 371	<b>Pete's Dragon</b>	Motion Picture
13	Gp 111 695	Elliott the Dragon	Drawing
14	PA 125 861	<b>The Fox and the Hound</b>	Motion Picture
15	VAu 10 933	Todd (Young)	Drawing
16	VAu 10 930	Copper (Pup)	Drawing
17	VAu 10 936	Vixey	Drawing
18	VAu 10 928	Big Mama	Drawing
19	VAu 12 417	Dinky	Drawing
20	VAu 12 418	Boomer	Drawing
21	VAu 12 415	Squeeks	Drawing
22	PA 252 525	<b>The Black Cauldron</b>	Motion Picture
23	VAu 24 517	Eilonwy	Drawing
24	VAu 29 561	Fflewddur	Drawing
25	VAu 24 518	Gurgi	Drawing
26	VAu 24 070	Hen Wen	Drawing
27	VAu 24 592	The Horned King	Drawing
28	VAu 24 519	Taran	Drawing
29	VAu 47 075	Orddu	Drawing
30	VAu 47 073	Orgoch	Drawing
31	VAu 47 074	Orwen	Drawing
32	PA 290 808	<b>The Great Mouse Detective</b>	Motion Picture
33	VAu 76 103	Basil 185-126	Model Sheet
34	VAu 76 102	Dr. Dawson 1284-80	Model Sheet
35	VAu 81 570	Olivia	Model Sheet
36	VAu 76 100	Ratigan 285-166	Model Sheet
37	VAu 81 572	Fidget	Model Sheet
38	VAu 81 571	Flaversham	Model Sheet
39	VAu 86 112	Felicia - Clean Up Model 0238	Model Sheet
40	VAu 76 104	Toby 285-170	Model Sheet
41	VAu 85 019	Mrs. Judson	Model Sheet
42	VAu 85 021	Queen Victoria	Model Sheet
43	VAu 85 022	Bartholomew	Model Sheet
44	PA 385 556	<b>Oliver and Company</b>	Motion Picture
45	VAu 104 921	Dodger Construction Sheets	Model Sheet
46	VAu 104 920	Einstein Construction Sheets	Model Sheet
47	VAu 104 919	Frances Construction Sheets	Model Sheet
48	VAu 104 916	Rita Construction Sheets	Model Sheet
49	VAu 109 377	Oliver Rough Model	Model Sheet

1	VAu 109 379	Tito - Ruff Model	Model Sheet
2	VAu 119 949	How to Draw Georgette	Model Sheet
3	PA 431 543	<b>The Little Mermaid</b>	Motion Picture
4	VAu 123 355	Ariel 9-9-87 Ruff (Ariel)	Drawings
5	VAu 123 351	Scuttle	Drawings
6	VAu 123 354	Ruff Sebastion 9-4-87 (Sebastian)	Drawings
7	VAu 123 348	Ruff Ursula 9-9-87 (Ursula)	Drawings
8	VAu 123 352	Prince Eric	Drawings
9	VAu 123 350	Triton	Drawings
10	VAu 123 353	Flotsam/Jetsam	Drawings
11	VAu 123 349	Flounder	Drawings
12	PAu 1 024 341	<b>DuckTales</b>	Motion Picture
13	VAu 101 067	Launchpad McQuack	Pamphlet of Drawings
14	VAu 101 067	Webby	Pamphlet of Drawings
15	VAu 101 067	Doofus	Pamphlet of Drawings
16	VAu 101 067	Mrs. Beakley	Pamphlet of Drawings
17	VAu 101 067	Duckworth	Pamphlet of Drawings
18	PA 486 535	<b>The Rescuers Down Under</b>	Motion Picture
19	VAu 161 749	Cody	Model Sheets
20	VAu 155 884	Jake (Rough Models)	Model Sheets
21	VAu 155 844	McLeach (Rough Model)	Model Sheets
22	VAu 170 264	Marahute (Rough Model)	Model Sheets
23	PA 542 647	<b>Beauty and the Beast</b>	Motion Picture
24	VAu 200 866	Belle (Beauty and the Beast)	Artwork
25	VAu 210 914	Beast	Licensing Kit
26	VAu 194 311	Maurice (Beauty and the Beast)	Artwork
27	VAu 199 855	Mrs. Potts (Beauty and the Beast)	Artwork
28	VAu 200 868	Cogsworth (Beauty and the Beast)	Artwork
29	VAu 194 310	Lumiere (Beauty and the Beast)	Artwork
30	VAu 201 337	Chip (Beauty and the Beast)	Artwork
31	VAu 194 307	Gaston (Beauty and the Beast)	Artwork
32	VAu 194 309	LeFou (Beauty and the Beast)	Artwork
33	VAu 199 856	Phillipe (Beauty and the Beast)	Artwork
34	VAu 200 869	Featherduster (Beauty and the Beast)	Artwork
35	PA 583 905	<b>Aladdin</b>	Motion Picture
36	VAu 215 432	Aladdin - Aladdin	Model Sheet
37	VAu 215 453	Aladdin - Genie	Model Sheet
38	VAu 215 793	Aladdin - Abu	Model Sheet
39	VAu 218 349	Aladdin - Iago	Model Sheet
40	VAu 230 534	Aladdin - Rasoul	Model Sheet
41	VAu 218 348	Aladdin - The Sultan	Model Sheet
42	VAu 230 533	Aladdin - Jafar	Model Sheet
43	VAu 221 841	Aladdin - Jasmine	Model Sheet
44	VAu 221 842	Aladdin - Jafar as Beggar	Model Sheet
45	VAu 232 164	Aladdin - Narrator	Model Sheet

1	PA 659 979	<b>The Lion King</b>	Motion Picture
2	VAu 246 448	The Lion King - Mufasa	Model Sheet
3	VAu 245 946	The Lion King - Sarabi	Model Sheet
4	VAu 246 447	The Lion King - Simba	Model Sheet
5	VAu 246 440	The Lion King - Young Simba	Model Sheet
6	VAu 246 438	The Lion King - Nala	Model Sheet
7	VAu 246 664	The Lion King - Young Nala	Model Sheet
8	VAu 245 947	The Lion King - Rafiki	Model Sheet
9	VAu 245 945	The Lion King - Shenzi, Banzai & Ed	Model Sheet
10	VAu 246 437	The Lion King - Pumbaa	Model Sheet
11	VAu 245 662	The Lion King - Timon	Model Sheet
12	VAu 246 446	The Lion King - Scar	Model Sheet
13	VA 611 201	Zazu	Licensing Kit
14	PA 720 179	<b>Pocahontas</b>	Motion Picture
15	VAu 262 859	Pocahontas - Pocahontas Standing	Artwork
16	VAu 261 970	Pocahontas - Powhatan	Artwork
17	VAu 261 967	Pocahontas - Percy	Artwork
18	VAu 302 884	Pocahontas - John Smith	Artwork
19	VAu 302 886	Pocahontas - Meeko the Raccoon	Artwork
20	VAu 302 883	Pocahontas - Flit the Hummingbird	Artwork
21	VAu 300 559	Pocahontas - Ratcliffe	Artwork
22	VAu 302 885	Pocahontas - Grandmother Willow	Artwork
23	PA 765 713	<b>Toy Story</b>	Motion Picture
24	VAu 337 565	Toy Story - Woody	Artwork
25	VAu 337 566	Toy Story - Buzz Lightyear	Artwork
26	VAu 337 567	Toy Story - Hamm	Artwork
27	VAu 337 568	Toy Story - Rex	Artwork
28	VAu 337 569	Toy Story - Bo Peep Lamp and Sheep	Artwork
29	VAu 337 186	Toy Story - Lenny	Artwork
30	VAu 273 627	Toy Story - Mom	Artwork
31	VAu 348 598	Toy Story - Andy	Artwork
32	VAu 348 599	Toy Story - Hannah	Artwork
33	PA 795 221	<b>The Hunchback of Notre Dame</b>	Motion Picture
34	VAu 336 992	The Hunchback of Notre Dame - Quasimodo	Model Sheet
35	VAu 332 434	The Hunchback of Notre Dame - Esmeralda	Model Sheet
36	VAu 336 056	The Hunchback of Notre Dame - Phoebus	Model Sheet
37	VAu 336 057	The Hunchback of Notre Dame - Djali	Model Sheet
38	VAu 343 663	The Hunchback of Notre Dame - Gargoyles	Model Sheets
39	VAu 336 058	The Hunchback of Notre Dame - Clopin	Model Sheet
40	VAu 336 059	The Hunchback of Notre Dame - Frollo	Model Sheet
41	VAu 336 878	The Hunchback of Notre Dame - Will Doll/Sam Doll	Model Sheet
42	PA 670 961	<b>Hercules</b>	Motion Picture
43	VAu 369 603	Hercules - Hercules	Model Sheets
44	VAu 369 600	Hercules - Baby Hercules	Model Sheets
45	VAu 367 973	Hercules - Meg	Model Sheets
46	VAu 369 605	Hercules - Pegasus	Model Sheets
47	VAu 369 598	Hercules - Baby Pegasus	Model Sheets
48	VAu 367 965	Hercules - Phil	Model Sheets
49	VAu 367 964	Hercules - Hades	Model Sheets

1	VAu 367 969	Hercules - Pain	Model Sheets
2	VAu 375 850	Hercules - Panic	Model Sheets
3	VAu 377 944	Hercules - Hydra Head	Model Sheet
4	PA 799 025	<b>Mulan</b>	Motion Picture
5	VA 849 510	Mulan	Style Guide
6	VAu 379 045	The Legend of Mulan - Mulan	Model Sheets
7	VAu 379 027	The Legend of Mulan - Mulan as Ping	Model Sheets
8	VAu 379 021	The Legend of Mulan - Mushu	Model Sheets
9	VAu 379 024	The Legend of Mulan - Shang	Model Sheets
10	VAu 378 480	The Legend of Mulan - Kahn	Model Sheets
11	VAu 381 069	The Legend of Mulan - Cricket	Model Sheets
12	PA 901 890	<b>A Bug's Life*</b>	Motion Picture
13	VA 875 986	A Bug's Life*	Style Guide
14	VAu 399 357	Flik*	Model Sheets
15	VAu 399 356	Hopper*	Model Sheets
16	VAu 399 351	Atta*	Model Sheets
17	VAu 399 349	Dot*	Model Sheets
18	VAu 399 343	Dim*	Model Sheets
19	VAu 399 352	Tuck & Roll*	Model Sheets
20	VAu 399 350	Francis*	Model Sheets
21	VAu 399 348	Heimlich*	Model Sheets
22	VAu 399 353	Slim*	Model Sheets
23	VAu 399 342	Rosie*	Model Sheets
24	VAu 399 346	P.T. Flea*	Model Sheets
25	VAu 399 345	Manny*	Model Sheets
26	VAu 399 344	Gypsy*	Model Sheets
27	VAu 399 347	Thumper*	Model Sheets
28	VAu 399 354	Molt*	Model Sheets
	VAu 399 355	Queen*	Model Sheets
	PA 959 870	<b>Toy Story 2*</b>	Motion Picture
	VAu 414 563	Toy Story 2 - Al's Car*	Model Sheet
	VAu 405 573	Toy Story 2 - Bullseye*	Model Sheet
	VAu 406 700	Toy Story 2 - Coffee Table*	Model Sheet
	VAu 407 195	Toy Story 2 - Cushy Chair*	Model Sheet
	VAu 405 571	Toy Story 2 - Emporer Zurg*	Model Sheet
	VAu 405 572	Toy Story 2 - Jessie*	Model Sheet
	VAu 405 197	Toy Story 2 - L'il Yuppie*	Model Sheet
	VAu 405 574	Toy Story 2 - Prospector*	Model Sheet
	VAu 407 196	Toy Story 2 - Wood Chair*	Model Sheet
	VA960 902	Toy Story 2 - Style Guide*	Style Guide
	PA 974 011	<b>Dinosaur</b>	Motion Picture
	VAu 486 473	Aladar	Model Sheet
	VAu 486 477	Baylene	Model Sheet
	VAu 486 476	Bruton	Model Sheet
	VAu 486 478	Eema	Model Sheet
	VAu 486 475	Kron	Model Sheet
	VAu 486 474	Neera	Model Sheet
	VAu 486 472	Plio	Model Sheet
	VAu 486 479	Suri	Model Sheet

1	VAu 486 471	Yar	Model Sheet
2	VA 996 530	Dinosaur - Phase I	Style Guide
3	VA 992 942	Dinosaur - Phase II	Style Guide
4	PA 940 885	<b>The Emperor's New Groove</b>	Motion Picture
5	VA 999 573	Emperor's New Groove	Style Guide
6	VAu 479 682	Kronk	Model Sheet
7	VAu 479 685	Kuzco	Model Sheet
8	VAu 479 683	Kuzco Llama	Model Sheet
9	VAu 479 684	Pacha	Model Sheet
10	VAu 479 681	Yzma	Model Sheet
11	PA 1-250-536	<b>The Incredibles</b>	Motion Picture
12	VA 1-242-351	The Incredibles	Style Guide
13	PA 1-322-908	<b>Cars</b>	Motion Picture
14	VA 1-326-323	Cars – Style Guide	Style Guide
15	VA 1-403-647	Hannah Montana – Branding Guide	Style Guide
16	PA 659-601	<b>Tim Burton's The Nightmare Before Christmas</b>	Motion Picture
17	PA 1-313-530	<b>High School Musical</b>	Motion Picture
18	VA 1-405-082	High School Musical – Branding Guide	Style Guide
19	PA 1-627-575	<b>Hannah Montana the Movie</b>	Motion Picture
20	PA 1-635-067	<b>Up</b>	Motion Picture
21	PA 1-641-991	<b>G-Force</b>	Motion Picture
22	PA 1-606-305	<b>Wall-E</b>	Motion Picture
23	VA 1-663-815	Wall-E – Branding and Supplement Style Guide RSM 2008	Style Guide
24	PA 1-598-561	<b>High School Musical 2</b>	Motion Picture
25	VA 1-651-813	High School Musical 2 – Summer 2008 Style Guide Supplement	Style Guide
26	PA 1-613-593	<b>High School Musical 3: Senior Year</b>	Motion Picture
27	VA 1-655-713	Beverly Hills Chihuahua	One Sheet
28	PA 1-611-956	<b>Beverly Hills Chihuahua</b>	Motion Picture
29	Pau 2-921-728	Little Mermaid III: Ariel's Beginning	Screenplay
30	VA 515-038	Little Mermaid III: Ariel's Beginning	Comic Book
31	PA 1-623-231	<b>Bedtime Stories</b>	Motion Picture
32	PA 1-588-972	<b>Underdog</b>	Motion Picture
33	PA 1-595-126	<b>Enchanted</b>	Motion Picture
34	PA 1-332-118	<b>Meet the Robinsons</b>	Motion Picture
35	VA 1-358-218	Meet the Robinsons—Style Guide	Style Guide
36	PA 1-122-518	<b>Cinderella II : Dreams come true / produced by Walt Disney Television Animation ; directed by John Kafka</b>	Motion Picture
37	PA 1-612-331	<b>Cinderella III: A Twist in Time</b>	Motion Picture
38	PA 1-611-943	<b>Tinker Bell</b>	Motion Picture
39	PA 1-617-950	<b>Bolt</b>	Motion Picture
40	VA 1-663-828	Bolt – Fall/Winter Style Guide 2008	Style Guide
41	PA 1-688-323	<b>Toy Story 3</b>	Motion Picture
42	VA 1-800-737	Toy Story 3: GC Product Dev – Style Guide – Spring/Summer 2010	Style Guide



**EXHIBIT B**  
**DEI'S TRADEMARKS**

<b>Trademark</b>	<b>Mark Drawing Code</b>	<b>Trademark Registration No.</b>	<b>Trademark Registration Date</b>
Mickey Mouse	Typed Drawing	3,115,395	7/11/2006
Mickey Mouse	Standard Character Mark	3,767,849	3/30/2010
Mickey Mouse	Typed Drawing	3,006,349	10/11/2005
Mickey Mouse	Typed Drawing	0,315,056	7/17/1934
Mickey Mouse	Standard Character Mark	3,750,188	2/16/2010
Mickey Mouse	Typed Drawing	1,152,389	4/28/1981
Mickey Mouse	Design Only	2,704,887	4/8/2003
Mickey Mouse Head Device	Design Only	2,781,693	11/11/2003
Minnie Mouse	Typed Drawing	3,102,338	6/06/2006
Minnie Mouse	Design Only	2,700,619	3/25/2003
Minnie Mouse	Standard Character Mark	3,767,850	3/30/2010
Minnie Mouse	Standard Character Mark	3,740,338	1/19/2010
Minnie Mouse	Typed Drawing	3,002,502	9/27/2005
Pluto	Typed Drawing	1,152,383	4/28/1981
Pluto	Design Only	2,707,323	4/15/2003
Goofy	Typed Drawing	1,159,124	6/30/1981
Goofy	Design Only	2,721,608	6/3/2003
Donald Duck	Typed Drawing	1,161,868	7/21/1981
Donald Duck	Design Only	2,700,620	3/25/2003

Donald Duck	Typed Drawing	3,150,077	9/26/2006
Daisy Duck	Design Only	2,704,890	4/8/2003
Disney	Typed Drawing	1,162,727	7/28/1981
Disney	Typed Drawing	3,490,082	8/19/2008
Disney Princess	Standard Character Mark	3,459,442	7/1/2008
Walt Disney	Typed Drawing	1,141,312	11/11/1980
Walt Disney Signature	Standard Character Mark	3,584,878	3/3/2009
Winnie the Pooh	Typed Drawing	3,024,287	12/6/2005
Pooh	Design Only	2,704,888	4/8/2003
Pooh	Typed Drawing	3,395,652	3/11/2008
Piglet	Standard Character Mark	4,118,780	3/27/2012
Piglet	Design Only	2,700,618	3/25/2003
Tigger	Design Only	2,860,445	7/6/2004
Eeyore	Design Only	3,591,616	3/17/2009
Eeyore	Typed Drawing	3,464,628	7/8/2008
Eeyore	Standard Character Mark	3,658,573	7/21/2009
Walt Disney's Cinderella	Design Plus Words, Letters, and/or Numbers	3,057,988	2/7/2006
Walt Disney's Snow White & the Seven Dwarfs	Design Plus Words, Letters, and/or Numbers	2,891,463	10/5/2004
Walt Disney's Sleeping Beauty	Design Plus Words, Letters, and/or Numbers	2,895,966	10/19/2004
Sleeping Beauty	Standard Character Mark	3,775,134	4/13/2010
Peter Pan	Standard Character Mark	3,745,492	2/2/2010

Walt Disney's Peter Pan	Design Plus Words, Letters, and/or Numbers	2,895,967	10/19/2004
Peter Pan	Standard Character Mark	3,662,111	7/28/2009
Tinker Bell	Standard Character Mark	3,648,929	7/20/2006
Tinker Bell	Standard Character Mark	3,636,910	6/9/2009
Tinker Bell	Design Only	3,624,833	5/19/2009
Tink	Typed Drawing	3,734,512	1/5/2010
Hannah Montana	Standard Character Mark	3,478,026	7/29/2008
Hannah Montana	Standard Character Mark	3,413,555	4/15/2008
Hannah Montana	Standard Character Mark	3,473,757	7/22/2008
Hannah Montana	Standard Character Mark	3,413,552	4/15/2008
Lilo & Stitch	Typed Drawing	2,811,097	2/3/2004
Lilo & Stitch	Typed Drawing	2,845,107	5/25/2004
Pinocchio	Standard Character Mark	Serial Number 77618061	n/a
Pinocchio	Standard Character Mark	Serial Number 77625073	n/a
Cars	Design Plus Words, Letters, and/or Numbers	3,358,115	12/18/2007
Cars	Design Plus Words, Letters, and/or Numbers	3,178,664	11/28/2006
Lightning McQueen	Standard Character Mark	3,370,157	1/15/2008
Mater	Standard Character Mark	3,406,600	4/1/2008
Rust-Eze	Standard Character Mark	3,294,617	9/18/2007
Doc Hudson	Standard Character Mark	3,321,900	10/23/2007
Toy Story	Typed Drawing	2,520,404	12/18/2001

Toy Story	Standard Character Mark	3,971,114	5/31/2011
Ariel	Standard Character Mark	3,814,910	7/6/2010
Beauty and the Beast	Typed Drawing	2,961,693	6/14/2005
Princess Jasmine	Standard Character Mark	3,998,366	7/19/2011
Princess Jasmine	Standard Character Mark	Serial Number 85,182,806	n/a
High School Musical	Standard Character Mark	3,506,572	9/23/2008
High School Musical	Standard Character Mark	3,433,096	5/20/2008
High School Musical	Standard Character Mark	3,420,394	10/24/2006
High School Musical	Standard Character Mark	3,469,823	7/15/2008
Meet the Robinsons	Standard Character Mark	3,420,082	4/29/2008
Meet the Robinsons	Standard Character Mark	3,354,473	12/11/2007
The Cheetah Girls	Standard Character Mark	3,252,269	6/12/2007
Walt Disney Pictures Presents The Wild	Standard Character Mark	3,389,689	2/26/2008
Disney Bolt	Standard Character Mark	3,648,251	6/30/2009
Disney Bolt	Standard Character Mark	3,604,222	4/7/2009
Wall-E	Standard Character Mark	3,686,824	9/22/2009
Wall-E	Standard Character Mark	3,528,986	11/4/2008



**EXHIBIT C****DC COMICS' COPYRIGHTED DESIGNS**

<b>Copyright Registration</b>	<b>Title of Work (Character)</b>	<b>Type of Work</b>
Txu 1-080-661	DC Comics Anti-Piracy Guide Batman Robin Superman Wonderwoman Supergirl Justice League	Style Guide
VAu 1-059-478	DC Comics Anti-Piracy Style Guide	Style Guide
TX 5-581-762	Superman	Monthly Publication
TX 3-221-758	Superman	Style Guide
TXu-532-372	DC Comics style guide.	visual arts



**EXHIBIT D****DC COMICS' TRADEMARKS**

<b>Trademark</b>	<b>Trademark Registration No.</b>	<b>Trademark Registration Date</b>
Bat Emblem	1,581,725	2/6/1990
Bat Emblem	1,581,593	2/6/1990
Bat Emblem	1,581,659	2/6/1990
Bat Emblem	2,119,266	12/9/1997
Bat Emblem (BATMAN BEGINS)	3,299,017	9/25/2007
Bat Emblem (BATMAN BEGINS)	3,110,604	6/27/2006
Bat Emblem (BATMAN BEGINS)	3,326,043	10/30/2007
Bat Emblem (BATMAN BEGINS)	3,313,612	10/16/2007
Bat Rep II	1,219,120	12/7/1982
BATARANG	3,291,749	9/11/2007
BATCAVE	4,135,575	5/1/2012
BATGIRL	3,070,999	3/21/2006
BATLINK	2,483,295	8/28/2001
BATMAN	856,045	9/3/1968
BATMAN	828,412	5/9/1967
BATMAN	839,561	11/28/1967
BATMAN	858,860	10/22/1968
BATMAN	1,221,720	12/28/1982
BATMAN	1,652,640	6/30/1991
BATMAN	1,622,749	11/13/1990
BATMAN	2,457,655	6/5/2001
BATMAN & ROBIN	2,171,937	6/7/1998
BATMAN & ROBIN	2,404,483	11/14/2000
BATMAN & ROBIN	2,245,040	5/11/1999
BATMAN BEYOND	2,762,067	9/3/2003

1	BATMAN BEYOND	2,688,935	2/18/2003
2	BATMAN BEYOND	2,649,865	11/12/2002
3	BATMAN BEYOND	2,643,418	10/29/2002
4	BATMAN on Bat Rep	382,770	11/12/1940
5	BATMAN on Bat Rep II (Side Face) (3D)	804,709	3/1/1966
6	Batman Rope Rep	1,262,504	12/27/1983
7	BATMAN THE RIDE	1,861,233	11/1/1994
8	BATMOBILE	1,124,961	9/11/1979
9	BATMOBILE (By Assignment)	1,179,342	11/24/1981
10	BATWING & Bat Emblem (outline)	2,858,716	6/29/2004
11	CATWOMAN	3,181,586	12/5/2006
12	CATWOMAN	1,052,504	11/9/1976
13	CATWOMAN	1,565,883	11/14/1989
14	CATWOMAN	1,883,034	3/7/1995
15	CATWOMAN	1,966,766	4/9/1996
16	DAILY PLANET	3,018,523	11/22/2005
17	DAILY PLANET	3,066,593	3/7/2006
18	DAILY PLANET	3,349,268	12/4/2007
19	DOUBLE W Design	1,332,090	4/23/1985
20	GOTHAM CENTRAL	3,391,794	3/4/2008
21	GOTHAM CITY	3,353,156	12/11/2007
22	GOTHAM GIRLS	2,868,577	8/3/2004
23	GOTHAM KNIGHTS	3,391,795	3/4/2008
24	JIMMY OLSEN	1,190,637	2/23/1982
25	JOKER	1,052,503	11/9/1976
26	KRYPTO	1,168,306	9/8/1981
27	KRYPTO THE SUPERDOG	3,061,112	2/21/2006
28	KRYPTO THE SUPERDOG	3,018,682	11/22/2005

1	KRYPTO THE SUPERDOG & S in Shield & Rep (in Flying Cape)	3,066,745	3/7/2006
2			
3	KRYPTONITE	1,239,506	5/24/1983
4	KRYPTONITE	2,656,768	12/3/2002
5	LEX LUTHOR	1,634,007	2/5/1991
6	LEX LUTHOR	2,802,600	1/6/2004
7	LOIS & CLARK	3,355,918	12/18/2007
8	LOIS LANE	2,781,372	11/11/2003
9	LOIS LANE	1,184,702	1/5/1982
10	MAN OF STEEL	2,226,436	2/23/1999
11	MR. FREEZE	2,157,292	5/12/1998
12	ROBIN	1,294,617	9/11/1984
13	ROBIN	1,930,901	10/31/1995
14	Robin Rep II	1,279,991	5/29/1984
15	S Logo	1,197,814	6/15/1982
16	S Logo	1,182,041	12/15/1981
17	S Logo	1,199,552	6/29/1982
18	S Logo	1,199,630	6/29/1982
19	S Logo	1,182,172	12/15/1981
20	S Logo	1,189,376	2/9/1982
21	S Logo	1,184,881	1/5/1982
22	S Logo	1,199,690	6/29/1982
23	S Logo	1,179,537	11/24/1981
24	S Logo	2,226,415	2/23/1999
25	S Logo	2,211,378	12/15/1981
26	S Logo (black)	1,140,418	10/14/1980
27	S Logo (black)	1,173,150	10/13/1981
28	SUPERGIRL	2,023,091	12/6/2005
	SUPERGIRL	2,943,882	4/26/2005

1	SUPERGIRL	1,238,334	5/17/1983
2	SUPERGIRL in Telescopic	414,623	6/19/1945
3	SUPERMAN	3,615,518	5/5/2009
4	SUPERMAN	1,070,290	7/26/1977
5	SUPERMAN	648,647	7/16/1957
6	SUPERMAN	1,184,822	1/5/1982
7	SUPERMAN	1,175,907	11/3/1981
8	SUPERMAN	1,180,068	12/1/1981
9	SUPERMAN	1,209,668	9/21/1982
10	SUPERMAN	1,182,947	12/22/1981
11	SUPERMAN	1,186,803	1/19/1982
12	SUPERMAN	1,183,841	12/29/1981
13	SUPERMAN	1,189,393	2/9/1982
14	SUPERMAN	1,248,822	8/23/1983
15	SUPERMAN	1,216,976	11/16/1982
16	SUPERMAN	1,181,536	12/8/1981
17	SUPERMAN	1,221,718	12/28/1982
18	SUPERMAN	2,204,195	11/17/1998
19	SUPERMAN	2,419,510	1/9/2001
20	SUPERMAN in Telescopic	1,185,526	1/12/1982
21	SUPERMAN in Telescopic	1,183,809	12/29/1981
22	SUPERMAN in Telescopic	1,185,853	1/12/1982
23	SUPERMAN in Telescopic	1,189,355	2/9/1982
24	SUPERMAN in Telescopic	1,200,394	7/6/1982
25	SUPERMAN in Telescopic	1,220,896	12/21/1982
26	SUPERMAN in Telescopic	1,182,226	12/15/1981
27	SUPERMAN in Telescopic	1,209,863	9/21/1982
28	SUPERMAN in Telescopic	1,218,552	11/30/1982
	SUPERMAN in Telescopic	1,181,537	12/8/1981

1	SUPERMAN in Telescopic	2,226,026	2/23/1999
2	SUPERMAN in Telescopic & Chains Rep II (Midrift)	391,821	11/25/1941
3	SUPERMAN in Telescopic (By Assignment)	371,803	10/10/1939
4	SUPERMAN in Telescopic (color)	1,108,577	12/12/1978
5	Superman Rep III (Running)	1,180,292	12/1/1981
6	Superman Rep III (Running)	1,178,048	11/17/1981
7	Superman Rep IV (Hands on Hips)	1,201,149	7/13/1982
8	Superman Rep IX (Flying Figure)	1,200,387	7/6/1982
9	Superman Rep V (Running)	1,209,743	9/21/1982
10	Superman Rep VI (Flying Figure)	1,201,167	7/13/1982
11	Superman Rep VII (Stepping-Up)	1,235,769	4/26/1983
12	Superman Rep VIII (Flying Figure)	1,229,321	3/8/1983
13	Superman Rep X (Standing Clenched Fists)	1,200,233	7/6/1982
14	SUPERMAN RIDE OF STEEL	2,485,624	9/4/2001
15	THE DARK KNIGHT	3,680,537	9/8/2009
16	THE DARK KNIGHT	3,690,538	9/8/2009
17	THE DARK KNIGHT	3,680,539	9/8/2009
18	THE DARK KNIGHT	1,458,274	9/22/1987
19	The Joker Rep	1,256,974	11/8/1983
20	THE MAN OF STEEL	1,433,864	3/24/1987
21	The Penguin Rep III (Jumping)	1,236,489	5/3/1983
22	TWO FACE	2,009,805	10/22/1996
23	WONDER WOMAN	1,221,717	12/28/1982
24	WONDER WOMAN	1,388,425	4/1/1986
25	WONDER WOMAN Logo	820,334	12/13/1966
26	WONDER WOMAN Logo II	395,739	6/9/1942
27	Wonder Woman Rep III	1,236,490	5/3/1983



**EXHIBIT E****SANRIO CO.'S COPYRIGHTED DESIGNS**

<b>Copyright Registration</b>	<b>Title of Work (Character)</b>	<b>Type of Work</b>
TX 3-769-888	SANRIO 1993 Product and Sales Promotion Catalog	Literary Work
VAu 684-322	Sanrio 2005 Character Guide	Graphic Artwork
VA 1-303-874	Character Merchandising	Collective work of artwork, text and photos
VA 1-296-115	2004 – 100 Characters	Graphic Artwork
VA 811-440	Bad Badtz Maru	Graphic Artwork
VAu 498-617	Chococat	Art original
VA 130-420	Hello Kitty	Graphic Artwork
VA 636-579	KeroKeroKeroppi	Sticker Book
VA 707-212	KeroKeroKeroppi	Pictorial Cartoon Drawing
VA 246-421	Little Twin Stars	Stickers
VA 840-495	Monkichi	Graphic Artwork
VA 130-419	My Melody	Graphic Artwork
VA 130-421	Patty & Jimmy	Graphic Artwork
VA 636-582	Pekkle	Graphic Artwork
VA 840-496	Picke Bicke	Graphic Artwork
VA 636-580	Pochaco	Sticker Book
VA 148-625	Tuxedo Sam	Stickers
VA 840-494	Winkipinki	Graphic Artwork
VA 636-581	Zashikibuta	Stickers
VA 1-352-721	Keroppi / Little Frog...Big Splash	Visual Material
Vau 1-078-385	Sanrio 2010 Character Guide	Visual Material



**EXHIBIT F**  
**SANRIO'S TRADEMARKS**

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date
Chococat	Design Plus Words, Letters, and/or Numbers	2,842,707	5/18/04
Chococat	Design Plus Words, Letters, and/or Numbers	2,707,592	4/15/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,705,164	4/8/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,714,130	5/6/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,952,043	5/17/05
Chococat	Design Plus Words, Letters, and/or Numbers	2,845,315	5/25/04
Hello Kitty	Design Only	1,200,083	7/6/82
Hello Kitty	Design Only	1,277,721	5/15/84
Hello Kitty	Typed Drawing	1,215,436	11/9/82
Hello Kitty	Typed Drawing	1,279,486	5/29/84
Hello Kitty	Typed Drawing	1,391,550	4/29/86
Hello Kitty	Design Only	1,370,105	11/12/85
Keroppi	Standard Character Mark	3,531,383	11/11/08
Keroppi	Standard Character Mark	3,181,350	12/5/06
Keroppi	Standard Character Mark	3,531,382	11/11/08
Keroppi	Standard Character Mark	3,181,349	12/5/06
Keroppi	Standard Character Mark	3,436,548	5/27/08
Keroppi	Standard Character Mark	3,181,348	12/5/06

1	Keroppi	Standard Character Mark	3,181,347	12/5/06
2	Keroppi	Standard Character Mark	3,449,938	6/17/08
3	Keroppi	Standard Character Mark	3,531,381	11/11/08
4	Keroppi	Standard Character Mark	3,531,380	11/11/08
5	Keroppi	Standard Character Mark	3,181,346	12/5/06
6	Keroppi	Standard Character Mark	3,423,288	5/6/08
7	Keroppi	Standard Character Mark	3,181,345	12/5/06
8	Little Twin Stars	Typed Drawing	1,341,864	6/18/85
9	Little Twin Stars	Typed Drawing	1,192,946	4/6/82
10	Little Twin Stars	Standard Character Mark	3,245,999	5/29/07
11	Little Twin Stars	Standard Character Mark	3,245,998	5/29/07
12	Little Twin Stars	Standard Character Mark	3,245,997	5/29/07
13	Little Twin Stars	Standard Character Mark	3,245,994	5/29/07
14	Little Twin Stars	Standard Character Mark	3,245,993	5/29/07
15	Little Twin Stars	Standard Character Mark	3,245,992	5/29/07
16	Little Twin Stars	Standard Character Mark	3,245,991	5/29/07
17	Monkichi	Standard Character Mark	3,699,381	10/20/09
18	My Melody	Typed Drawing	1,305,637	11/20/84
19	My Melody	Typed Drawing	1,210,192	9/28/82
20	Pekkle	Typed Drawing	2,053,346	4/15/97
21	Pochacco	Typed Drawing	2,236,507	4/6/99
22	Pochacco	Typed Drawing	1,985,358	7/9/96

1	Sanrio	Design Plus Words, Letters, and/or Numbers	2,506,705	11/13/01
2	Sanrio	Typed Drawing	2,506,577	11/13/01
3	Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,680	6/3/03
4	Sanrio	Design Plus Words, Letters, and/or Numbers	2,742,381	7/29/03
5	Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,679	6/3/03
6	Sanrio	Design Plus Words, Letters, and/or Numbers	2,693,639	3/4/03
7	Sanrio	Design Plus Words, Letters, and/or Numbers	2,696,063	3/11/03
8	KEROKEROKEROPPI	Standard Character Mark	3,531,378	11/11/2008
9	KEROKEROKEROPPI	Standard Character Mark	3,531,376	11/11/2008
10	Bow	Design only	3,260,857	7/10/2007
11	Bow	Design only	3,359,800	12/25/2007
12	Bow	Design only	3,359,801	12/25/2007
13	Bow	Design only	3,272,377	7/31/2007
14	Bow	Design only	3,260,860	7/10/2007
15	Bow	Design only	3,362,512	1/1/2008
16	Bow	Design only	3,348,608	12/4/2007
17	Bow	Design only	3,249,704	6/5/2007
18	Bow	Design only	3,362,514	1/1/2008
19	Bow	Design only	3,359,799	12/25/2007
20	Bow	Design only	3,260,858	7/10/2007

Bow	Design only	3,445,304	6/10/2008
Bow	Design only	3,260,859	7/10/2007
Bow	Design only	3,359,802	12/25/2007
Bow	Design only	3,260,861	7/10/2007
Bow	Design only	3,253,794	6/19/2007
Bow	Design only	3,260,862	7/10/2007
Outline of Hello Kitty	Design only	3,666,736	8/11/2009
Outline of Hello Kitty	Design only	3,756,724	3/9/2010
Outline of Hello Kitty	Design only	3,751,315	2/23/2010
Outline of Hello Kitty	Design only	3,868,138	10/26/2010
Outline of Hello Kitty	Design only	3,756,725	3/9/2010
Outline of Hello Kitty	Design only	3,666,736	8/11/2009
Outline of Hello Kitty	Design only	3,679,187	9/8/2009
Outline of Hello Kitty	Design only	3,865,208	10/19/2010